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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT COMMUNITY
RELATIONS PLAN NATIONAL PRIORITY LIST SITE NAS CECIL FIELD FL
4/2/1991
U S EPA REGION IV



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UNITED STATES ENVIRONMENTAL PROTECTION
REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

APR 03 1991

4WD-RCRA&FFB

Deane E. Leidholt, Commander, CEC
U.S. Navy, Public Works Officer
NAS Cecil Field
Jacksonville, FL 32215-5000

RE: Cecil Field NAS NPL Site
Jacksonville, Florida

Dear Commander Leidholt:

I received the draft Community Relations Plan (CRP) for the subject site on March 27, 1991. It has been reviewed by Ms. Shirley Jones, our Community Relations Coordinator, and myself. We would like to offer the following comments on the draft CRP:

GENERAL COMMENTS

1. The CRP is a tool, required by law, to outline a method by which the lead agency at a Superfund site can ensure public participation and adequate information dissemination. The document belongs to the public. It outlines their concerns and gives recommendations on effective communication tools. The draft CRP has an outline of potential activities, but invariably qualifies proposed activities in terms of "if necessary". Many of these activities should be planned at this point. In addition, the draft CRP does not distinguish who will determine if the activity has become "necessary". The document also states that meetings or speakers will be provided "if requested". This statement would seem to indicate that these meetings or speakers are available on command. Was this the intent of those statements? It is important to remain responsive to citizen requests, however, it may become difficult to provide effective community relations activities on demand. Overall, the CRP covers many of the activities suited to Superfund sites. It does not, however, provide an adequate plan for implementing them. The following specific comments should help to clarify EPA's concerns with the draft document.

2. The actual "meat" of the Community Relations Plan doesn't begin until page 17 of the document. Much of the earlier information (specifically pages 9-16 and including Figure 3) should be moved to the appendices.

3. Please make certain the CRP activities and chart schedule are corrected to include changes involving availability sessions and fact sheets.

4. Involve the media (print, radio or TV) to point out differences between Cecil Field and other nearby sites. Talk shows may also be effective in educating the nearby populations.

SPECIFIC COMMENTS

1. Page 20, 1st sentence - Remove "Though a strong economic and social contributor".

2. Page 22 - The fourth bullet under "Public notices will be provided:" should be corrected to mention the "Administrative Record" instead of the "Administration Record".

3. Page 23, "Public Meetings" - Community Relations activities should begin prior to initiation of RI activities at an Operable Unit. The CRP should be finalized and placed in the information repository, a fact sheet on the final Work Plan should be prepared and distributed, and a public meeting or availability session should be held to inform the public of the Work Plan contents. Additionally, a formal or informal meeting should be held with the residents of the nearby base housing areas. These people deserve special attention due to their proximity to certain areas covered under the Work Plan.

4. Page 23, "Public Comment Periods" - CERCLA/SARA requires a minimum 30 day public comment period with the potential for a thirty day extension upon timely request after preparation and announcement of the proposed plan. It is my understanding that, because the facility is also regulated by RCRA a 45 day public comment period may be required.

Public notices should be placed a minimum of two weeks in advance, give all the pertinent information on location, time, etc., and should run more than once. The public meeting should begin the public comment period. This allows the public time to review the materials in the information repository and/or administrative record and come to the meeting prepared to ask questions or make comments.

What is meant by the statement "-when a Record of Decision has been released for public review"? The Record of Decision will only be released as a final document.

Upon the close of the public comment period, the lead agency will prepare a written summary of significant comments, criticisms, and new relevant information submitted during the public comment period and the lead agency response to each issue. This responsiveness summary shall be made available with the record of decision.

5. Page 23, "Administrative Record and Information Repository" - The Responsiveness Summary is part of the Record of Decision. When the Record of Decision is signed and added to the Administrative Record, the Record is closed for that Operable Unit.

6. Page 24, "Fact Sheet Series" - At a minimum, fact sheets should be prepared to summarize the following:

Work Plan (this would include general information on the Superfund program as well)

completion of the RI activities. If outside community interest increases or is high throughout the RI process, more fact sheets may be warranted.

7. Page 24, "Mailing List" - The mailing list should be updated constantly. Every public meeting or other community relations activity will result in additions to the mailing list. Anyone writing or calling with questions concerning the Superfund activities should be added to the mailing list. Changes in local community group leadership and politics should also be reflected in the mailing list.

8. Page 24, "Technical Review Committee" - Is this really a community relations tool? The majority of the membership is governmental in nature. Unless public participation is increased, this shouldn't be considered a community relations activity.

9. Page 25, "Speaker Program" - What kind of presentations will be made? Upon request? Which project personnel will be sent? Will EPA and FDER be involved? How? How would the facility determine who they would provide with a speaker? This is an interesting idea for providing information, however, it is unclear how and by whom it will be implemented.

COMMUNITY RELATIONS ACTIVITIES SCHEDULE

10. "Remedial Investigation" - A fact sheet on the final Work Plan should be prepared and distributed, and a public meeting or availability session should be held to inform the public of the Work Plan contents. Additionally, a formal or informal meeting should be held with the residents of the nearby base housing areas. These people deserve special attention due to their proximity to certain areas covered under the Work Plan.

At a minimum, an availability session should be planned for completion of the RI activities. This would include a fact sheet, press release and public notices.

11. Feasibility Study - The following activities must be conducted at the completion of the feasibility study:

The administrative record and index must be made available for review and comment by the public.

The proposed plan and supporting information must be prepared and placed in the administrative record.

Publish a notice of availability and a brief analysis of the proposed plan in a major local newspaper of general circulation.

CERCLA/SARA requires a minimum 30 day public comment period with the potential for a thirty day extension upon timely request. It is my understanding that, because the facility is also regulated by RCRA a 45 day public comment period may be required.

Although the statute states the lead agency shall "provide an opportunity for a public meeting to be held at or near the site at issue regarding the proposed plan and the supporting analysis"; it is EPA policy to plan such a meeting. This should be included as a mandatory activity.

12. Remedial Design - EPA Region IV strongly recommends a public meeting be held at the completion of the Remedial Design and prior to beginning the Remedial Action.

13. COMMUNITY CONTACT LIST - This should be retitled "Mailing List" and include the media representatives listed earlier in the document. Please delete "Superfund Program" after my name on the TRC list.

14. If other city council members have an interest and/or constituents in this area they should be added to the the "Local Elected Officials" listing.

15. The mailing list for USEPA should include Shirley Jones, Community Relations Coordinator and myself. Please delete Ms. Mosely's name from your mailing list. Please also add Mr. Hagan Thompson, Public Affairs Office at the Region 4 address.

16. You may want to include ATSDR, and Federal and State Trustees on the mailing list as an efficient way of keeping them informed of the project's progress.

17. Please add Mr. Eric Nuzie in the FDER main office to the mailing list.

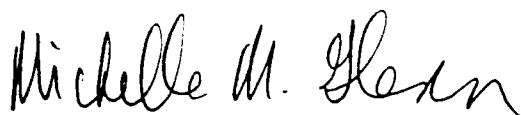
18. There are a number of private citizens listed without a complete mailing address. These addresses should be included.

19. There should be a separate listing for "Concerned Groups/Organizations".

20. Suggested Meeting Locations - Any public meetings or availability sessions should be held off the facility in an easily accessible meeting room.

If you have any questions concerning these comments, please call me at (404) 347-3016.

Sincerely,

A handwritten signature in cursive script that reads "Michelle M. Glenn".

Michelle M. Glenn
Senior Project Manager

cc: Shirley Jones, CRC
Eric Nuzie, FDER
Cliff Casey, SOUTHNAVFACENGCOM